

_AO91 (Rev. 8/01) Criminal Complaint

United States District Court

United States Magistrate Court
DSG-SOTX
FILED

SOUTHERN

DISTRICT OF

TEXAS

SEP 16 2014 2B

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

David J. Bradley, Clerk
Laredo Division

V.

Jorge MARTINEZ Jr.

Case Number:

5:14mj1199

Laredo, Texas

United States

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about September 14, 2014 in Laredo, Texas Webb County, in

(Date)

the Southern District of Texas, Jorge MARTINEZ Jr. defendant(s),

A United States Citizen, did unlawfully transport Mexican nationals Oscar TACUBENO-Apango and Pepe RIOS-De La Cruz, along with six (6) others and one (1) Guatemalan national, by means of a motor vehicle within the Southern District of Texas, knowing or in reckless disregard of the fact that said aliens had come to, entered, or remained in the United States in violation of law, and transported or moved said aliens within the United States by means of motor vehicle or otherwise, in furtherance of such violation of law.

in violation of Title 8 United States Code, Section(s)

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I further state that I am a(n) Homeland Security Investigations : Special Agent and that this complaint is based

Official Title

on the following facts: based on statements of the accused and the records of the Immigration & Customs Enforcement.

Continued on the attached sheet and made a part of this complaint:

☒ Yes☐ No

 Signature of Complainant

James Chang

Printed Name of Complainant

Sworn to before me and signed in my presence,

September 16, 2014

at

Laredo, Texas

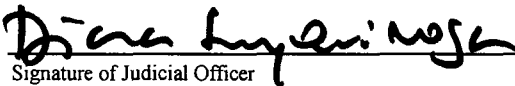
Date

City and State

Diana Song Quiroga

U.S. Magistrate Judge

Name and Title of Judicial Officer


 Signature of Judicial Officer

United States of America

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vs

Jorge MARTINEZ Jr.

[CONT OF BASIS OF COMPLAINT]

On September 14, 2014, Homeland Security Investigations (HSI) Laredo special agents (SAs) received a call for assistance from the United States Border Patrol South station regarding an alien smuggling event that involved the transportation of nine (9) undocumented aliens (UDAs). Border Patrol agents (BPA) assigned to the cameras advised Border Patrol agents (BPAs) working in the Santa Rita area that there were several subjects crossing the Rio Grande River into the United States.

A BPA working in the area observed the subjects run into the truck bed of a 2001 Ford F-150 (texas plate BJ82232). The BPA notified other BPAs of the situation and as he approached the vehicle on foot in an attempt to make an arrest, the driver fled the scene at a high rate of speed. A second BPA arrived on scene and clearly observed the driver of the vehicle, later identified as Jorge MARTINEZ Jr, as he attempted to perform a vehicle stop . The driver attempted to evade the BPA and continued driving until he reached a cul-de-sac. At this time, the subjects and driver attempted to abscond on foot but were apprehended by BPAs. All subjects were transported to the Laredo South Border Patrol station for processing. BPAs performed immigration inspections on all of the individuals that were inside of the vehicle and determined that eight (8) of them were Mexican nationals and one (1) of them was a Guatemalan national. All of the subjects admitted to entering the United States illegally.

HSI SAs arrived at the Laredo South Border Patrol station to conduct interviews. During questioning, material witness Pepe RIOS-De La Cruz stated that the vehicle that picked them up from the river was the same one that was apprehended by Border Patrol and the driver did not make any stops between picking them up from the river and being apprehended by Border Patrol. Material witness Oscar TACUBENO-Apango collaborated the statement made by RIOS-De La Cruz.

Pepe RIOS-De La Cruz and Oscar TACUBENO-Apango are being held as material witnesses for this case.